



May 7, 2018

Glenn Meeks
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114
glenn.meeks@waterboards.ca.gov

Subject: Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin (Basin Plans) to Incorporate a Central Valley-wide Salt and Nitrate Control Program

Dear Mr. Meeks:

The Natural Resources Defense Council (NRDC) and Defenders of Wildlife appreciate the opportunity to comment on the proposed Basin Plan Amendments to incorporate a Central Valley-wide salt and nitrate control program. Each of our groups has a long history of working to protect Delta water quality and to address the particular environmental and water quality threats posed by the improper management of agricultural drainage in the San Joaquin Valley.

We have read the May 4, 2018 comments of Alameda County Flood Control & Water Conservation District, Zone 7 (Zone 7) and Contra Costa Water District (CCWD) on the proposed Basin Plan Amendments (BPAs), and share their concerns about potential Delta water quality degradation as a result of the proposed amendments. We agree with Zone 7 and CCWD that the Central Valley dischargers should be responsible for the water quality and environmental problems resulting from their discharges. Other parties, especially the federal and state government, should not be required to cover the costs of drainage management in the Central Valley, which could result in an unwarranted cost to taxpayers while also reducing management incentives for those who generate the drainage. The proposed BPAs should also specifically address the discharge requirements applicable to the CVP's San Luis Unit Drainage Area.

On behalf of NRDC and Defenders of Wildlife, we wish to echo the concerns related to water quality expressed by Zone 7 and CCWD in their comment letter of May 4, 2018. If you have any questions, please contact us.

Sincerely,

Kate Poole
Natural Resources Defense Council

Rachel Zwillinger
Defenders of Wildlife